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FILED	ENTERED
LODGED	RECEIVED

OCT 25 2022 JC

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY
BY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Miles Edward Partman

22 CV - 01516 - TL
CASE NO. [to be filled in by Clerk's Office]

COMPLAINT AND REQUEST FOR
INJUNCTION

Plaintiff(s),

v.

City Of Seattle

Working Washington

Uber Technologies ect.,

Defendant(s).

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Miles E Partman
Street Address	12440 22nd ave south
City and County	Seatte King County
State and Zip Code	wa 98168
Telephone Number	206-384-8053

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B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Working Washington

Job or Title (if known) _____

Street Address 116 Wareen ave N Suite A

City and County Seattle King county

State and Zip Code washington 98168

Telephone Number 2532565176

Defendant No. 2

Name Uber Technologies

Job or Title (if known) _____

Street Address 1455 Market Street ste 400

City and County San Fransico

State and Zip Code california 94103

Telephone Number _____

Defendant No. 3

Name City Of Seattle

Job or Title (if known) Risk Managment

Street Address 600 4th Ave #103

City and County Seattle King County

State and Zip Code wa 98104

Telephone Number _____

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Defendant No. 4

Name

State of WashingtonJob or Title (*if known*)

Street Address

1125 washington street SE PO BOX 40100

City and County

olympia , Thruston

State and Zip Code

WA 98504

Telephone Number

II. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

human trafficking under little pay constituted under 22 usc 7201

expiration of Seattle Gig Worker premuim pay law

federal minimum wage base pay 7.25 for all gig apps using tecnology based apps (only phones)

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III. THE AMOUNT IN CONTROVERSY

The amount in controversy – the amount the plaintiff claims the defendant owes or the amount at stake – is more than \$75,000, not counting interest and costs of court, because (explain):

5,000 dollar under trafficking protection act 2000 uber still violating

after city of seattle vs uber

IV. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

febuaury 2021 to present

B. What date and approximate time did the events giving rise to your claim(s) occur?

last 2 years it was brought to my attetion

C. What are the facts underlying your claim(s)? (For example: what happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

caused homelessness, suffering survival issues and barely able to survive due to little pay

please see letter to your honor attached

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V. IRREPARABLE INJURY

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

further implications of human trafficking under

22 usc 7201 with pay being half minimum wage of federal standard, which constituyes

~~not~~ little pay or uber continued deceptive practices

VI. RELIEF

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.


see letter to your honor


VII. CERTIFICATION AND CLOSING


Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

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I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: october 24th 2022
Signature of Plaintiff 
Printed Name of Plaintiff Miles Edward Partman

Date of signing: 10/24th/2022
Signature of Plaintiff 
Printed Name of Plaintiff Miles Partman

Date of signing: 10/24/2022
Signature of Plaintiff 
Printed Name of Plaintiff Miles Edward Partman

Miles partman vs City Of Seattle, Working Washington and State Of Washington, Uber Technology Company

Dear your Honor

I have Been a gig worker for almost 5 years . I recently discovered that City Of Seattle has been violating Federal law under human trafficking 22 USC 7201 and equal opportunity Act under Eqaul pay for same suitable type jobs aka gig jobs. Human trafficking is defined as Forcing someone into something with little or no pay aka forced labor. If premium Pay under the Gig Worker premium Pay Ordinance is allowed to expire. Orders for 5 dollars and 50 cents will be 3 Dollars minimum. It would be defined as less then half the federal minimum wage and little pay. Which by legal defintion under Federal law 22 USC 7102 is human trafficking. I have personally seen the effects of human trafficking, Not only from gig economy apps which I survive on hence my indigency form but also im the victim of human trafficking from individuals not named in this civil suit.Which should qualify me for Trafficking victims protection act 2000.Which can be discussed at later hearing. I also present to you evidence via photograph dated October 19th 2022 at 5:13 pm.

I also ask you that Pay up legislation that due to come into effect in 2024 is a form of human trafficking under 22 USC 7201 that any pay under 10 dollars per order per National Consumer Inflation Rate is human trafficking because of low pay as a result you cant buy anything at regular stores or fill up your gas tank or as you seen my Shirt super faded. In other terms you cant survive day to day on pay up legislation or 3 dollars a order . I cant survive beyond reasonable doubt. Its part of reason im in court today. and im homeless. I have seen the direct effects that under ten dollars minimum per order

As crazy as it sounds. Katy from Seattle Police Department wanted me to sue the City Of Seattle. As rep of City Of Seattle I would believe the City of Seattle engaged in wrong doing or why would they say that?

I am also asking that you keep HB2076 from going into effect in 2023 regarding minimum Pay amounts as it results in human trafficking under 22 USC 7201 as minimum of 3 Dollars to 5.17 is under Federal minimum wage and with the consumer product. Inflation rate being at \$9.99. If Federal minimum wage in 2009 of 7.25 had the same buying power today. Also to prevent even further implications of human trafficking I ask that all orders or tasks under gig apps or being independent contractor using technology based app either be granted at \$10 dollars minimum before tips or whatever National Consumer Inflation Rate is at, Whichever is more as we deserve to not be human trafficked.

I have notified the WA State Governor office assistant and City Of Seattle City Council members with no response besides Lisa Herbold assistant regarding Pay up legislation, Which is by Working Washington a defendant in this situation and still violates 22 USC 7201 - Human trafficking under Minimum Pay amounts. I have also notified a representative from working Washington and They never got back to me on stopping human trafficking in Seattle

Today, I am asking you to grant a Temporary Stay. Or Temporary Restraining order against City Of Seattle from Letting the \$2.50 premium Pay from expiring on October 31st 2022. Which would violate Federal law 22 USC 7201 under Human trafficking for little or no pay and forced labor as some of us including me use these gig economy apps for survival as our lives depend on these apps. I also request future hearing at least 2 weeks out to have hearing on future of gig worker premium pay in Seattle and Pay up legislation which also results in human trafficking and violates equal opportunity Act under equal pay under suitable same type jobs by saying some apps under transportation Network companies and other apps don't apply but do same type of gig job. . Also requiring temp pay increase. For all gig apps including Uber Eats and door dash within City of Seattle and King County and if needed Washington State, as to not violate human trafficking laws that You make. \$7.25 minimum / Base pay per each individual orders and or pick up per all gig apps at least Federal minimum wage. at least 5 days after this goes into effect until further notice. I am also asking you to keep Seattle Premium Pay Ordinance in place so that Uber can come in compliance with \$1.25. For every additional drop off aka Batch orders

. Also, to get a judgment on amount uber owes people under the Gig premium Pay ordinance at later hearing related to batch pay and intently human trafficked people after it failed to follow the Gig worker premium pay law for Batch orders and make corrections after City Of Seattle vs Uber. Also, I ask of you to Sanction Uber 5000 dollars under Trafficking Protection act 2000 for Human trafficking me and other uber drivers or related services under uber. Which can be Proven beyond reasonable doubt under deceptive practices of not following the batch order Directive of \$1.25 or let us know the pay amount up front with batch order as Human trafficking is defined as little or no pay under fraud/ Deceptive practices or force or coercion. Uber has not fallen into compliance to this day with the Gig Worker Premium pay law and This time it has to do with Batch pay missing amount of \$1.25 of additional pay for Batch orders also known multiple pickups. Which shows intent of human trafficking by Uber Technologies.

Vehicle Type

Delivery

Time Requested

5:44 PM

Date Requested

Sun, Oct 23

Points Earned 

12 points

Tip Included 

\$5.00

Paid to you

Fare

\$2.56 

Base

\$2.56

Promotion

\$0.08 

Boost

\$0.08

October 29

2022

5:44 PM

Uber & preptive prayer

Tip Included 

\$5.00

Paid to you

Fare \$2.56 

Base \$2.56

Promotion \$0.08 

Boost \$0.08

Other earnings \$5.00 

Seattle Premium Pay \$5.00

Tip \$5.00

Your earnings \$12.64

October 29th
2022 - 85:44 PM



October 12 2022

5:19 PM

my 46er 54174



October 18 2022

5:19 PM

My Utor Smart
Folder